

In the matter of: Proposed National Policy Statement for Highly Productive Land

And: **Naran Makan Limited**

Submitter

And: **Ministry for Primary Industries**

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Submission on Proposed National Policy Statement for Highly Productive Land

Dated: 10 October 2019

1. This submission is on behalf of Naran Makan Limited in relation to Ministry for the Environment and Ministry for Primary Industries proposed National Policy Statement for Highly Productive Land. Naran Makan Limited will gain no competitive advantage through the lodgement of this submission.
2. Naran Makan Limited are third generation vegetable growers in the Pukekohe region. Growing over 40 Hectares of vegetables these include Potatoes, Onions, Pumpkin, Butternut, Leeks and Garlic. We have operating in line New Zealand GAP and GlobalGAP programmes for Good Agricultural Practise for over the past 15 years audited annually. These programmes cover all aspects of commercial vegetable production e.g. Environmental issues, agrichemical use and storage, Nutrients, Water, Produce Handling and packing, just to name a few examples of environmental initiatives are
 - 1) Installation of silt traps to contain sediment run off on property in a heavy rain event.
 - 2) Wheel track ripping after crops have been planted to minimise soil movement
 - 3) Planting of cover crops (oats, mustard) to enhance soil health and control soil run off

The proposed National Policy Statement for Highly Productive Land (NPS-HPL) proposes to essentially lock land into productive use in order to prevent the valuable soil resource being fragmented or lost to urban expansion. However if we cannot viably grow vegetables on our HPL due constraints i.e. Water and Nutrients and soil borne diseases we would be closing our operation down with no option to do anything further with our HPL effectively ending

our livelihood and three generation's worth of work. The flow on would be less vegetables available for New Zealanders with the probable need to import at the risk limited food safety.

- 4) I support the adoption of a National Policy Statement for Highly Productive Land (NPS-HPL), on the basis that this will discourage inappropriate use and fragmentation of finite land that is suitable for commercial vegetable production (CVP). I do not however consider that soil (and to some degree topography) should be the only considerations in determining highly productive land. There are a number of factors that make up a viable productive unit. The reliance on the Land Use Capability system as an interim measure is, on this basis, considered to be unsuitable.
- 5) It is considered that the definition of Highly Productive Land **must take into account all essential criteria that make up a viable production unit**. These include soil type, size, topography, productivity, sustainability (specifically regarding the requirement for rotational cropping to avoid the build-up of soil pests and diseases), suitably consented irrigation water, reverse sensitivity, ability to utilise nutrients, economic viability and avoidance of biosecurity threat, and natural disasters. Unless all essential elements are in place to enable a viable production operation to be undertaken, it is perverse to restrict land use options.
- 6) It is also considered that the NPS-HPL must be looked at in the context of other proposed regulation. In particular:
 - a. the proposed National Environmental Standard for Freshwater (NES-FW) which essentially caps CVP to a limited area, despite a growing domestic population to feed.
 - b. the proposed National Policy Statement for Freshwater Management (NPS-FM) which identifies catchments that require rapid reduction in nitrates. These align in many cases to areas of land that are considered to be highly productive and used for CVP. Required nitrate reductions in some of these areas are as high as 80%. Reductions of between 30% and 50% are common and even at these rates of reduction, it is considered likely that many CVP businesses in these catchments will be unable to run a productive operation at the scale required to make the business viable.
- 7) The proposed National Policy Statement for Highly Productive Land (NPS-HPL) proposes to essentially 'lock' land into productive use, in order to prevent the valuable soil resource being fragmented or lost to urban expansion. However, if the land cannot viably be used for production, but cannot be used for any other use, the landowner stands to lose both their equity and their livelihood. Commercial vegetable production will reduce as a result and food may need to be imported to meet the growing fresh produce requirements of our country.
- 8) Pukekohe and the surrounds, in particular, provide a hub for commercial vegetable production (CVP) which significantly contributes to meeting the fresh produce demands of the domestic market¹ and is likely to be significantly adversely impacted by the cumulative effects of proposed regulation including the NPS-HPL, NPS-FM and NES-FW.
- 9) Pukekohe is unique within New Zealand as it presents favourable climatic conditions for the growing of crops, enabling winter production. In the north, crops are constrained by disease pressures, and further south may be subject to frosts.

¹ Deloitte's New Zealand's Food Story 'The Pukekohe Hub' Prepared for Horticulture New Zealand, August 2018

- 10) Deloitte's acknowledged the significance of this location in providing for our national fresh vegetable consumption in 'New Zealand's Food Story – The Pukekohe Hub', August 2018 and confirmed that this area contributes to 26% of the nation's value of production of vegetables.
- 11) We urge you to thoroughly consider the definition of highly productive land. We also ask that you address the implications of restricting land use change in the context of other proposed legislation.
- 12) We do not consider that regional councils are adequately resourced to cater for additional mapping requirements, again compounded by the excessive resourcing requirements imposed by numerous pieces of legislation currently proposed.
- 13) We support the location of activities that enhance the productive capacity of Highly Productive Land on that land. For example, glasshouses, packing sheds, post-harvest facilities, and distribution infrastructure that enhance the productive capacity of outdoor growers.
- 14) We support using incentives to improve the productive capacity of land. In some cases, this could provide for the development of land identified as Highly Productive Land. For example, transferable development rights in exchange for title aggregation.
- 15) We support policies to reduce reverse sensitivity issues, for example, requiring effective buffers at the rural-urban boundary interface.
- 16) An alternative option not considered within this discussion document but generally preferred by the growers in our area would be a National Environmental Standard specific to Commercial Vegetable Production.

Signed:



Kirit Makan